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PHASE I
ENVIRONMENTAL
SITE ASSESSMENT

Arrow Gear Company
2301 Curtiss Street & 5240 Belmont Road
Downers Grove, Illinois 60515

Prepared For:

Arrow Gear Company
2301 Curtiss Street & 5240 Belmont Road
Downers Grove, Illinois 60515

Prepared by:
NORTHWEST ENVIROCON, INC.
1000 Jorie Boulevard Suite 20
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EXECUTIVE SUMMARY

The subject of this Assessment is the Arrow Gear Company buildings located at 2301 Curtiss Street and 5240 Belmont Road in Downers Grove, Illinois. The facility is currently operating as a gear manufacturing company. The Property consists of two approximately 35 year old, single-story brick buildings. The area surrounding the site is a mixture of industrial buildings, commercial buildings and residential buildings.

As a result of the on-site reconnaissance, records research, historical investigation, and review of Federally reported environmental information, this Assessment has revealed no obvious evidence of recognized environmental conditions that could potentially impact the Property, with the exception of:

- **Loading Dock:** Staining was observed on the floor of the loading dock bay including surrounding the floor drain. Catch basins were not observed to be servicing the loading dock. It appears that water in the loading dock is directly diverted as runoff to St. Joseph's Creek through drainage pipes. Further investigation is advised.

- **Adjacent Property Contamination:** According to Mr. Les Bant of the DuPage County Health Department, a private well used by a small subdivision adjacent to the east of the Property was closed due to the elevated levels of trichloroethylene. Northwest Envirocon submitted a Freedom of Information request to the department for any available information. Further investigation is advised.

- **Suspect Asbestos-Containing Materials:** During the on-site inspection materials were observed, including but not limited to: drywall, ceiling tile, floor tile, thermal system insulation fittings and roofing materials. As defined in NESHAP 61.141, the observed materials may be classified as suspect asbestos-containing materials. Prior to demolition, renovation, or any other activity that could disturb these materials either an inspection should be performed by an accredited Building Inspector or the materials should be handled as asbestos-containing.

During the course of the on-site visual and physical inspection, interviews, document review, and records research, no further potential environmental risks or recognized environmental conditions indicating the presence of hazardous conditions were observed or discovered.

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ASSESSMENT OVERVIEW

Purpose:

The purpose of this Phase I Environmental Site Assessment was to investigate, review, assess, and evaluate-- through historical research, document and record review, generally available environmental data, visual or physical observations, and inspection by a trained assessor-- the presence or likely existence of:

- Contamination by hazardous materials, generally recognized environmental contaminants, visible pollutants, underground contaminants, and asbestos-containing materials.
- The possibility that these materials are or may have been introduced-- by internal generation, external introduction, or unknown sources-- into the structure or subject Property.
- A brief overview, evaluation, and assessment of the severity of the current potential environmental risk based upon known standards or applicable regulations.

Unless specifically noted within the text of this Report, this Phase I Environmental Site Assessment does not include or address groundwater, soil, or extraneous material contamination upon or under the surface soils, with respect to testing, coring, or sampling analysis.

Protocol:

The procedure for this Environmental Site Assessment was to perform in practical and reasonable steps-- employing currently available technology, existing regulations, and generally acceptable engineering practices-- an investigation to ascertain the possibility, presence, or absence of environmental releases or threatened releases as limited by the Scope of Work.

Objectives:

- To attempt to accomplish all appropriate inquiry into ownership and uses of the Property consistent with good commercial or customary practice, in an effort to minimize liability.
- To conduct an investigation of the Property that will assist ownership's positioning within the "safe harbor" section of the Federal Superfund liability in 42 U.S.C. §9601(35).
- To provide environmental information that will assist in evaluating ownership's risk of potential loss or value impairment of the security interest, due to environmental defects.

While this Phase I Assessment cannot absolutely quantify and qualify every possible past and present environmental risk, the Assessment does provide a partial information basis for reasonable decision making regarding the potential for environmental liabilities and risk, based upon the current Site-specific situation, Assessment limitations, and methods of evaluation.

GENERAL SITE RECONNAISSANCE OVERVIEW

Mr. James Pielsticker of Arrow Gear Company engaged Northwest Envirocon, Inc. (NWE) to perform a Phase I Environmental Site Assessment at 2301 Curtiss Street and 5240 Belmont Road in Downers Grove, Illinois. The Property is located south of Curtiss Street and west of Belmont Road. Mr. Pielsticker identified Mr. E.D. Kauzlarich, Vice President of Facilities, to accompany the Assessor during the on-site investigation. Mr. Pielsticker acted as the Key Site Manager. The Key Site Manager is the person identified as having the most reliable knowledge as to the previous uses and current condition of the subject Property and is in a position to provide reasonably accurate information for the Field Screen Questionnaire. The Field Screen Questionnaire, was received via fax on July 23, 1996. According to the Questionnaire no previous environmental site assessments have been performed on the Property. A copy of the Field Screen Questionnaire is provided in the Appendix.

SUBJECT PROPERTY SITE DESCRIPTION

Physical Setting Source:

In order to ascertain the physical setting of the subject Property, a review was conducted of the appropriate current United States Geological Survey (USGS) 7.5 Minute Topographic Quadrangle (quad) Map. The USGS 7.5 minute quad map has an approximate scale of 1 inch to 2,000 feet and shows physical features such as wetlands, water bodies, roadways, mines, and buildings. The physical and natural features shown are areas of visual emphasis when conducting an on-site inspection of the subject Property. The USGS 7.5 Minute Quad Map is considered to be the only Standard Physical Setting Source and is sufficient as a single reference. A copy of the topographic map is included in the appendix.

The subject Property is identified on the Wheaton, ILL 1962, 7.5 Minute Topographic Quadrangle Map photorevised in 1972 and 1980. The Property is located on the south side of Curtiss Street, west of Belmont Road. St. Joseph Creek adjoins the Property to the north. The Burlington Northern Railroad is approximately 1/4 mile north of the Property. Two structures are visible on the Property. The structure along Belmont Road is comparable to the structure that stands there today. The larger structure along Curtiss Avenue contains a portion of the building which is designated as an addition either before 1972 or 1980. The Property is located in a designated non-residential area. The elevation of the Property is approximately 695 feet above mean sea level. The subject Property is surrounded by industrial buildings.

Visual Description:

The subject Property contains two structures occupied by Arrow Gear Company. Curtiss Street adjoins the subject Property to the north. Belmont Avenue adjoins the Property to the east. Access is available to the Property from paved driveways leading from both Belmont Road and Curtiss Avenue. Both buildings are single-story structures built approximately thirty years ago. The larger building is approximately 120,000 square feet and consists of offices, the primary manufacturing area, material storage, shipping and receiving, machine repair, product cleansing area and a heat processing area.

The smaller building is approximately 20,625 square feet and consists of primarily storage, with minimal manufacturing processing.

The area adjoining the Property is a mixture of light industrial, warehousing, distribution and manufacturing.

Surface Characteristics:

The Property surface is paved asphalt surrounding the facility with landscaped and grass areas along the Property boundaries. As observed during the Site observations and confirmed in the USGS topographic map, the Property exhibits a slight drainage to the north. Sewer outfalls are located throughout the parking areas. No signs of visible staining were observed at any of the drain locations.

During the course of the on-site observations, particular attention was directed toward (i) pools of liquid; (ii) roads and paths that might be used for unauthorized entry; (iii) drains and sumps; (iv) stressed vegetation; (v) pits, ponds, or lagoons; (vi) surface or soil staining; (vii) ditches, catch basins, or drywells; (viii) location of manholes, sewer grates, sewer outfalls; and (ix) other subterranean accesses. All roads, driveways, paths, and other vehicular access areas were identified and evaluated for suspected use as an avenue for transport or disposal of hazardous materials, regulated substances, or petroleum products. Railroad tracks and previous right-of-ways are also identified if present on the subject Property.

Access is available to the Property from paved driveways leading from both Belmont Road and Curtiss Avenue.

The vegetation observed on the subject Property appeared to be in good condition during the on-site investigation.

Potential wetland area indicators were considered during the on-site activities. These indicators can include (i) wetland characteristic soil type; (ii) areas that appear permanently wet during most of the year; (iii) the presence of wetlands-related submergent or emergent plants; and (iv) wetland indicative wildlife.

Subsurface and Hydrological Characteristics:

The subsurface soil of the local area has been identified by the Department of Agriculture, Soil Conservation Service as Urban Land - Orthents Complex, Clayey. In general, the soil consists of Urban land and areas of altered fine textured soils.

The Orthents, clayey are used for lawns, gardens, parks, recreational areas, building sites, borrow areas and rights-of-highway. Extensive leveling exposes the underlying material in places and makes maintenance of plant cover difficult. Many areas need extensive drainage, top dressing, and other special management before a trim turf can be established.

The source is United States Department of Agriculture Soil Survey of DuPage and Part of Cook County.

Groundwater flow directions typically conform to the topography of the local and regional area.

The groundwater flow direction at the subject Property was reported to flow north. In the local area the groundwater depth is approximately twelve to twenty-five feet below grade. However, due to the local water demands, subsurface conditions, and recharge rates, the groundwater depth may fluctuate significantly.

It should be noted that the characterization previously described is merely a generalization extrapolated from available soil data. In actuality, the subsurface of the subject Property has likely been modified by cuts and fills for building foundation and underground utilities.

Non-Native Fill or Backfill:

There is no indication as to whether or not the non-native fill or backfill was brought onto the site based on the visual inspection of the subject Property. No areas of disturbed earth or soil piles were observed during the on-site inspection.

HISTORICAL USAGE
STANDARD INFORMATION SOURCES:
LOCAL AND STATE

Standard Historical Sources are categorized as either Fifty-Year Complete or Developmental Complete. A Standard Historical Source is considered Fifty-Year Complete if the information contained within the source provides the required information through and back to the 1940 cutoff date in either five year intervals or Property milestone events. A Standard Historical Source is considered Developmental Complete if the information contained within the source provides the required information from the point that the Property initially developed (other than agriculture use) continuously to the present in either five year intervals or Property milestone events.

Historical Site milestones are typically construction activities that involve structure construction, renovation, or remodeling at any location within the subject Property; major changes in the topography or grade of the Site; installation or construction of roads, utilities, water or sewer systems; installation, removal, or modification of permanent equipment; or installation, removal, or modification of above or below ground tanks.

A Standard Historical Source is considered Developmental Complete if the information contained within the source provides the required information from the point that the Property exhibited development (other than agricultural) or structure construction continuously to the present in either five year intervals or Property milestone events.

Fifty-Year Complete Standard Historical Source Summary:

The following sources were researched to complete the fifty-year standard historical source: the Downers Grove Building Department, Lisle Township Assessor's Office, the Downers Grove Fire Department, the Sanborn Mapping Company, the DuPage County Assessor's Office, aerial photographs, interviews and a topographic map. None of these sources were able to complete the fifty-year source.

Developmental Complete Standard Historical Source:

According to interviews and the records available at the Lisle Township Assessor's Office the larger building at 2301 Curtiss Street was built in approximately 1960. This larger structure has had several additions. The second smaller facility at 5240 Belmont Road was built in 1964.

Building Department:

The Northwest Envirocon Assessor visited the Downers Grove Building Department on July 23, 1996. According to a representative, historical building permit information is not available.

Township Assessor's Office:

The Northwest Envirocon Assessor visited the Lisle Township Assessor's Office on July 24, 1996. The following information was available:

08-12-407-011 (5220-5240 Belmont Road): 1964 was indicated as the construction date for a facility approximately 125' x 150'. The building is situated on 1.79 acres. The facility contains no basement, one slop sink, seven sinks, nine commodes, and two urinals. Several permits were on file:

DATE	PERMIT #	DESCRIPTION
10/19/76	334	Re-roofing
11/12/76	350	Remodeling
10/27/86	256	Unknown

08-12-407-013 (2301 Curtiss Street): 1960 was indicated as the construction date. An addition (approximately 81' x 75') to the southwest corner area of the building was added in 1982. Several permits were on file:

DATE	PERMIT #	DESCRIPTION
11/11/83	GAR384	Addition
04/19/88	GAR134	Addition
04/02/90	GAR101	Remodel
05/17/94	GAR228	5 HVAC Units

Aerial Photographs:

The Assessor reviewed several aerial photographs for the subject Property at the DuPage County Building. The photographs were dated from 1964 to 1984. The following observations were made:

1964 The subject Property contains a structure. The building is located at the 2301 Curtiss Street address. St. Joseph's Creek adjoins the Property to the north.

Additionally, Curtiss Street adjoins the Property to the north. Two large facilities adjoin the Property to the south. Several properties adjoin the Property to the east, including Belmont Road and St. Joseph's Creek. Vacant land adjoins the Property to the west.

1968 Two structures are located on the subject Property. The larger structure at 2301 Curtiss Street appears to have an addition. The second structure is located at 5240 Belmont Road and is comparable to the structure that stands there today. The adjoining properties do not appear to have changed from the 1964 aerial photograph.

1972 The subject Property and adjoining properties do not appear to have changed from the 1968 aerial photograph.

1975 The subject Property and adjoining properties do not appear to have changed from the 1972 aerial photograph except that there are three structures adjoining to the south of the Property.

1978 The larger building on the subject Property appears to have an addition. A smaller ancillary building is located just west of the larger structure on the Property. Four structures adjoin the Property to the south. The adjoining properties to the north, east and west do not appear to have changed from the 1975 aerial photograph.

1981 The subject Property and adjoining properties do not appear to have changed from the 1978 aerial photograph.

1984 The third ancillary structure appears to have had an addition. The industrial park surrounding the Property appears to be further developing.

Fire Insurance Rating Map Historical Information:

In 1867 the Sanborn Map Company began preparing detailed street maps of densely populated areas throughout the United States. The purpose of the mapping process was to assist insurance agents in rating the degree of fire hazard for a particular area or property. The maps drawn by the Sanborn Company indicate the type of building construction, the nature of land use, the configuration of buildings and the surrounding land, as well as identifying the location of above and below ground storage tanks. This investigation has relied upon the collection of Sanborn Maps owned by the Sanborn Mapping and Geological Information Service Company. Sanborn Maps were requested from the Sanborn Mapping and Geological Information Service Company, however they were not available.

Recorded Land Title Records:

Recorded land titles are records usually maintained by the municipal clerk or county recorder of deeds which detail ownership fees, leases, land contracts, easements, liens, deficiencies, and other encumbrances attached to or recorded against the subject Property in the local jurisdiction having control for or reporting responsibility to the subject Property. Due to state land trust regulations and laws, land title records will often only provide trust names, bank trust numbers,

owners' names, or easement holders, and not information concerning previous uses or occupants of the subject Property. Additionally, environmental liens recorded against the subject Property are considered outside the scope of recorded land title records.

For these reasons, this Environmental Site Assessment has relied upon other standard historical information sources assumed to be either more accurate or informative than recorded land titles.

CURRENT USAGE INFORMATION SOURCES: LOCAL AND STATE

Fire Department - Emergency Release Reports /SARA §304:

The Northwest Envirocon Assessor interviewed a Downers Grove Fire Department representative via phone on July 24, 1996. According to the representative, approximately four tanks were once located on the subject Property. In 1991 one 1,800-gallon waste oil tank and one 1,000-gallon cooling tank were abandoned in place. The remaining two tanks were removed and remediated. Additionally, in July of 1991 four above ground storage tanks were installed; one with mineral spirits and three with oil.

Local/State Waste Disposal Compliance:

During the on-site investigation waste disposal practices appeared to be maintained.

VISUAL AND PHYSICAL OBSERVATIONS AND INFORMATION: STRUCTURAL AND BUSINESS OPERATIONAL

The on-site visitation of the subject Property was conducted on July 30, 1996 at 1:00 pm by Northwest Envirocon Assessor Heather A. Molitor. The site inspection weather consisted of cloudy skies with temperatures in the mid 70's. Mr. James Pielsticker, Executive Vice-President of Arrow Gear Company, was identified by Mr. E.D. Kauzlarich, Vice President of Facilities, to accompany the assessor during the on-site observation. Mr. Pielsticker was also identified as the Key Site Manager.

The Key Site Manager is the person identified as having the most reliable knowledge as to the previous uses and current condition of the subject Property and is in a position to provide reasonably accurate information for the Field Screen Questionnaire. The Field Screen Questionnaire was not completed prior to the completion of this report. A copy is included in the Appendix.

Structure Construction:

The structures occupy approximately 30% of the subject Property. The remaining 70% is occupied by a paved parking area and landscaped areas. The exteriors of the buildings on the subject Property are brick and glass with a flat roof design. The buildings are situated on concrete slabs.

Interior Configuration:

The larger structure at 2301 Curtiss Avenue is sectioned into several areas including an office area, shipping area, repair area, stamping area and offices. The facility is situated on a concrete slab.

The smaller structure located at 5240 Belmont Road is sectioned into a manufacturing area and office space.

Business Operations Description:

Gear manufacturing takes place at the subject Property. Several separate areas of the manufacturing stages were observed on the Property. The larger facility consisted of a stripping and cleaning area, a gear cutting machinery area, partial warehouse, a small paint room, large gas ovens for hardening and wearability of the steel, a sandblasting area, material storage, a machine repair and maintenance area.

The type of businesses housed in the building are within the classes of industries with higher probabilities of environmental risk. This classification is based upon the SIC code reported by the business as applicable to their operation. The complex general category of business operations identified by the EPA is not a higher risk industry. Particular attention was paid to those activities that may have presented an elevated potential for environmental impact.

According to Mr. Kauzlarich, the subject Property's previous business practices included the use of trichlorethylene for the purposes of cleansing and bathing finished products. According to Mr. Kauzlarich, the cleaning processing has remained at the same location on the subject Property.

According to neighbors in the immediate area, trichlorethylene was found at high levels in their private drinking well. The well can no longer be used and was closed approximately one year ago. Mr. Les Bant of the DuPage County Health Department confirmed that a private well used by a small subdivision in the area was closed due to the high levels of trichloroethylene. Northwest Envirocon submitted a Freedom of Information request to the department for any available information.

MATERIAL, PRODUCT, AND WASTE-STREAM HANDLING AND PROCESSING

Materials/Products Handling and Storage:

Several plastic containers and steel drums of chemicals were observed to be stored in an area at 2301 Curtiss Street used for product cleansing. The containers rested on a raised steel grated floor. Beneath the steel grated floor was a spill retainage system constructed of an approximately 1' high poured concrete floor. According to Mr. Kauzlarich, this area does not contain a drain for obvious purposes. Chemicals in this area included: sodium hydroxide neutralizer, hydrochloric acid, nitric acid, ammonia, acid, ethyl glycol (anti-freeze), chemical spill cleanup absorbent, and copper stripper. Evidence of a previous drainage system was observed on the corners of the retainage area.

A large nitrogen tank approximately 20' x 6' was observed on the exterior of the buildings west side, next to the dust collector. The nitrogen is used for the deep freezers located in the interior of the building. The freezers are also used in a cleaning process.

Several dozen, steel, fifty-five gallon drums of quenching oil were observed in the area where the gas fired furnaces are located. According to Mr. Kauzlarich, the quenching oil is used to cool the products when the hardening and wearability processing is completed.

Approximately fourteen fifty-five gallon drums were observed in the loading dock area including the storage of such chemicals as methanol and magnaflux. The drums were lied on their sides and doubled up on a rack next to a wall. The drums are currently in use as the Assessor observed tappers on each drum indicating easy and quick access. Bins were observed beneath the tappers and appeared to catch excess material dripping from the drums. Heavy staining was observed beneath the drums. According to Mr. Kauzlarich, the wall behind the drums is non-load bearing. Better housekeeping practices should be implemented to ensure further staining is kept to a minimum.

Several dozen steel fifty-five gallon drums were observed on the exterior western side of both buildings on the subject Property. An area was set aside for full drums as well as empty drums. The drums were unable to be closely observed, as they were fenced off. An ammonia-type aroma was detected surrounding this material storage area. Material storage should be housed in the interior of the building.

According the Field Screen Questionnaire answered by Mr. James Pielsticker, of Arrow Gear Company, the business operations are required to maintain the notification requirements of the Hazard Communication Standard (29 CFR 1910.1200). Reporting under the Spill Prevention, Control and Countermeasures program to address accidental chemical spills (40 CFR §109-114) is not required.

Potable Water Supply and Sewer Service:

Potable water and sewer services are supplied by the Village of Downers Grove. No septic tanks or wells were observed during the on-site investigation.

Storage Tanks - Above and Below Ground:

During the course of the on-site activities, particular attention was directed toward indicators of above or below ground storage tanks, including (i) fill pipes or overflow pipes; (ii) areas of abnormal or heavy staining; (iii) manways, manholes, or access covers; (iv) abandoned concrete saddles or gravity racks; (v) abandoned pumping equipment or gasoline pumps; (vi) concrete pads not homogeneous with surrounding surfaces; (vii) concrete build-up areas potential pump islands or non-homogeneous patching; or (viii) new fill areas or fill.

During the on-site investigation two pipes were observed on the southwestern corner of the building. An obvious petroleum aroma was detected from one of the pipes. These pipes are characteristic of a vent and fill pipe for an underground storage tank. During an additional visit performed on August 20, 1996, it was concluded that this area did not contain an underground storage tank. The larger of the pipes was used for a natural gas line feed and the smaller second pipe was used for electrical conduit.

During the second site visit performed on July 29, 1996 Mr. Kauzlarich directed the Northwest Envirocon Assessor to the location where two underground storage tanks were previously located. One tank, which was abandoned in place, was located by the loading docks where currently the above ground storage tanks are located. The indicator observed was a concrete filled manway. The second underground storage tank, which was removed and remediated, was previously located at the gas-fired furnaces area. No indicators of this previous underground storage tank were observed.

Three stationary above ground storage tanks were observed in the loading dock area on the north side of 2301 Curtiss Street. The tanks were labeled as follows; waste oil, waste coolant and sludge, and waste coolant. The tanks appeared to be in good condition with no signs of leakage.

Two mobile, smaller, above ground storage tanks were observed on the western end of the building at 2301 Curtiss Street. The tanks were labeled "for waste oil" and "for coolant use only". Minimal staining was observed on the exterior of these tanks. Better housekeeping practices should be implemented to ensure material is not spilled from these tanks.

Waste Stream Processing and Disposal:

During the on-site observation, particular attention was directed toward activities or situations that could be considered contamination indicators by a regulated substance. Potential indicators of contamination or violation can include: (1) stained or discolored sinks, drains, catch basins, drip pads, or sumps; (2) spills around loading docks, fueling areas, catch basins, or surface drains; (3) waste disposal areas, dumpsters, and other storage containers--evidence of spills, or staining should be recorded; (4) pipes, gutters, spouts, or tubes protruding into potential bodies of water; or (5) waste stored on-site over 90 days that may require a RCRA Part B permit.

A loading dock was observed on the north side of 2301 Curtiss Street. The loading dock contained two bays. One bay was used for transportation of raw materials and finished products and the second was used for the storage of a large dumpster for the metal shavings created from processing. Staining was observed on the floor of the bay including surrounding the floor drain.

Observation of the bay where the dumpster was located was limited due to the size of the dumpster. The bay appeared to be heavily stained. A liquid material with a green tint was observed surrounding the dumpster. The liquid is believed to be water from recent heavy rainfalls. The color of the liquid is unexplainable. Catch basins were not observed to be serviceing the loading dock. It appears that water in the loading dock is direclty diverted as runoff to St. Joseph's Creek through drainage pipes.

Waste Dumpsters:

Three 3-cubic yard, covered, roll-a-way waste dumpsters were observed on the east side of 2301 Curtiss Street. All three were labeled with BFI, Inc. The dumpsters appeared to be in good condition with no signs of leakage or staining.

An approximate ten cubic yard, stationary, uncovered dumpster was observed on the west side of 2301 Curtiss Street. This dumpster was also labeled with BFI, Inc. The dumpster appeared to be in good condition with no signs of leakage or staining.

One, approximately 1.5-cubic yard, steel dumpster was observed in the shipping and receiving area. The dumpster was labeled with Rots Disposal and appeared to be in good condition with no signs of leakage.

Two approximately 1-cubic yard dumpsters were observed in the loading dock area and were labeled with BFI, Inc. The dumpsters appeared to be in good condition with no signs of leakage.

A large approximately 8' x 8' x 20', uncovered, stationary dumpster was observed in the east bay of the loading dock area. The dumpster was labeled with Cozzi. Metal shavings were observed in the dumpster. The dumpster appeared to be in good condition. As stated in the previous section, a liquid material was observed surrounding the dumpster.

Two approximately 12-cubic yard, stationary, uncovered dumpsters were observed on the west side of 5240 Belmont Road. The dumpsters appeared to be in good condition with no signs of leakage.

Several other smaller dumpsters were observed throughout both facilities, however no noticeable signs or evidence of staining was observed during the on-site investigation.

Wastewater, Stormwater Discharges:

All point source discharges regulated by the Clean Water Act (CWA) are subject to the applicable water quality-based standards as established in the National Pollutant Discharge Elimination System (NPDES) codification 40 CFR Subpart D §131.36. Additionally, CWA Sections 402 (p)(1) and (p)(2) have created categories of stormwater discharges within Permit Issuance and Permit Compliance Deadlines for Phase I Stormwater Discharges effective October 1, 1993, that may also be applicable to the subject Property (as detailed in the Federal Register, Volume 57, Number 244). Depending upon the outcome of EPA-initiated notice and comment revisions actions for further rulemaking clarification, the subject Property may be required to submit a NPDES initial stormwater discharge permit under 40 CFR §122.26 or 40 CFR Chapter I - Preamble Appendix A.

However, based upon information supplied during interviews and review of the relevant documents supplied to the Assessor, no requirements for NPDES permitting were discovered that are currently applicable to the subject Property.

VISUAL AND PHYSICAL OBSERVATIONS AND INFORMATION: ADJACENT AND ADJOINING PROPERTIES

For the Scope of this Assessment, properties are defined and categorized based upon their physical proximity to the subject Property. An *adjacent property* is any real property located within 0.25 mile of the subject Property's border. An *adjoining property* is any real property whose border is contiguous or partially contiguous with the subject Property, or that would be if the properties were not separated by a roadway, street, public thoroughfare, river, or stream.

Adjacent and Adjoining Properties - General Description:

The adjacent and adjoining properties surrounding the Property are primarily comprised of industrial buildings.

Adjoining Properties:

The Property is bordered by the following:

North: Curtiss Street, industrial buildings
East: Belmont Road
South: Industrial buildings
West: Industrial building

Adjoining Properties Description:

Adjoining to the north of the Property is Curtiss Street directly followed by Dynatech a large gear manufacturer. Adjoining to the south are several industrial buildings. Adjoining to the east is Belmont Road dirctly follwed by residential homes. Adjoining to the west is an industrial building.

Adjacent and Adjoining Properties Materials Storage:

During the on-site observations of the adjoining properties there was no visual indication of improper material storage. During the on-site observations of the adjoining properties there was no visual indication of improper wastestream disposal.

POTENTIAL ON-SITE CONTAMINATION SOURCES

Air Quality: Indoor and Visible Emissions:

The Northwest Envirocon Assessor observed a dust collector on the southwest side of the structure. The dust collector is used to collect the residue from the sandblasting performed in the building directly east of the collector. A steel 55-gallon drum was observed to be the final ending point of the dust created by the machinery inside the facility. The drum rested on a poured concrete slab.

Asbestos-Containing Building Materials:

During the on-site inspection materials were observed including but not limited to: drywall, ceiling tiles, floor tiles and roofing materials. As defined in NESHAP §61.141 the observed materials may be classified as suspect regulated asbestos-containing materials. Prior to demolition, renovation, or any other activity that could disturb these materials either an inspection should be performed by an accredited Building Inspector or the materials should be handled as asbestos-containing.

Formaldehyde:

Formaldehyde is an extremely popular chemical used in a variety of both building materials and furnishing products. Currently national usage is estimated in the billions of pounds per year. EPA has now classified formaldehyde as a "probable human carcinogen" suspected of inducing cancer in humans. Studies have shown that after installation, indoor formaldehyde levels require years of decline and reach residual background levels. During the off-gassing process, the indoor levels can be a significant source of irritation to hypersensitive individuals.

The formaldehyde product investigated within the scope of this Assessment is urea-formaldehyde foam insulation (UFFI), used in the 1970's primarily as wall cavity insulation. The release potential of UFFI from wall cavities is dependent upon factors such as water-damaged walls, unpainted wall surfaces, or cracked paint or wall covering. While interior air sampling and analysis is the only conclusive method to delineate formaldehyde concentrations, visual and physical inspection of the subject Property and interviews with the Key Site Manager indicate a low potential for UFFI contamination.

Lead-Based Paint:

In 1978, the Federal Government banned the use of lead-based paint in residential applications, however use in general industry continued at a decreased rate to the present. Lead-based paint presents a hazard through inhalation or ingestion of paint chips or vapor fumes. The greatest cumulative health threat is to young children, and for this reason the Department of Housing and Urban Development (HUD) has promulgated lead standards and survey requirements for buildings affected by HUD funding. This HUD regulation represents the only Federal requirement for lead-based paint hazard management applicable to privately owned structures.

OSHA exposure standards 29 CFR 1926.62 are applicable to general industry, but address business operations rather than facility condition. Therefore, within the context of regulatory compliance for OSHA and assuming HUD standards to be usage-based, the subject Property, considering the current usage, does not appear to require further lead-based paint response regardless of the potential for existence of lead-based paint.

Lead in Drinking Water:

Based upon the age of the building, there is a potential for the interior plumbing to contain lead in the pipes or lead-based solder, based upon construction standards before 1987 (40 CFR 141.11). The presence or absence of elevated lead concentrations in the water can only be confirmed through laboratory testing. However, no current Federal regulations required individual property owners to test for lead in drinking water.

PCB-Containing Exterior Electrical Transformers:

The Northwest Envirocon, Inc. Assessor observed two pad-mounted transformers and six pole-mounted transformers on the Property. Several interior transformers were observed throughout the interior of the building. The interior transformers and pole-mounted transformers appeared to be in good condition with no signs of leakage observed.

The pad mounted transformers were observed on the outside of the southwestern corner of the larger building at 2301 Curtiss Street. One of the pad-mounted transformers was observed to have a material leaking onto the concrete pad. The Northwest Envirocon Assessor interviewed a representative from Commonwealth Edison on July 30, 1996 at 3:30 pm. According to the representative, all of the transformers located at the subject Property are owned by Commonwealth Edison.

PCB-Containing Fluorescent Light Fixture Ballasts:

Based upon the age of the subject Property structure and the number and appearance of the suspended fluorescent light fixtures, the potential exists for the ballasts inside the light fixtures to contain polychlorinated biphenyls (PCB). It would be prudent to identify the chemical content of the ballasts if they are found to be leaking, require replacement, or are subject to disposal.

Radon:

Radon is emitted by the natural breakdown and radioactive decay of uranium in rocks and soils, which then enters buildings through cracks in the foundation, sump pumps, areas around drainage pipes and other openings. In addition, radon may enter a structure as a water contaminant, natural gas contaminant, or off-gas by-product of building materials. Once inside an enclosed space, radon can accumulate.

Radon has been declared by the EPA as the second leading contributor to lung cancer, after smoking. EPA guidelines for the highest acceptable level of radon is 4 picocuries per liter (pCi/l). At this level, the estimated number of lung cancer deaths due to radon exposure is 13-50 out of 1,000. An EPA survey of indoor radon concentrations in 11,000 homes from Arizona to Massachusetts revealed that radon levels exceeded the EPA's action level of 4 pCi/l in one out of three homes. Yet another study in 10 other states found that one in five homes exceeded the 4 pCi/l level.

No visual estimation technique exists that accurately predicts the potential radon risk within a building. The radon risk is a function of site location, soil composition, building construction, foundation integrity, and previous landfill practices. Actual physical testing of a building is the only way to accurately determine the radon levels. Radon health risks can be controlled by recognizing the potential for a problem, by testing and by reduction of radon levels in the building.

Railroad Right-of-Way:

The Assessor did not observe evidence of railroad right-of-ways on the subject Property during the on-site investigation.

However, during the course of researching the subject Property, evidence of railroad tracks was observed on Sanborn Maps and sketches for the previous building that once existed on the Property.

POTENTIAL OFF-SITE CONTAMINATION: SOURCES AND RECEPTORS

Adjacent Property: Any real property located within 0.25 mile of the subject Property's border. Adjoining Property: Any real property whose border is contiguous or partially contiguous with the subject Property, or that would be if the properties were not separated by a roadway, street, public thoroughfare, river, or stream.

Potential Adjacent and Adjoining Property Contamination Sources:

The Assessor did not observe any potential adjacent or adjoining property contamination sources during the on-site investigation.

Potential Adjacent and Adjoining Property Contamination Receptors:

Environmentally sensitive receptors were investigated within a thousand feet of the borders of the subject Property. The sensitive receptors are materials or structures particularly susceptible to environmental damage or stress from migrating contamination. The major receptor groups investigated were water supplies, surface water bodies, residential structures, and other public receptors. No environmentally sensitive receptors were found within the search parameters specified.

Review of Federally Reported Environmental Data:

This review of the existing compilation of the Federal environmental database attempts to identify environment problem sites, activities, and occurrences from the records and reports of the U.S. Environmental Protection Agency (US EPA). A detailed listing is included in the Appendix.

National Priorities List (NPL) of Superfund Sites:

The NPL is the EPA's database of hazardous waste sites currently identified and targeted for priority cleanup action under the Superfund program. A search of the 1995 National Priorities List revealed no Superfund sites within the subject Property's database search range.

Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980:

Mandated as part of the 1980 Superfund Act, the CERCLIS (Comprehensive Environmental Response, Compensation and Liability Information System) list is an EPA compilation of the sites investigated, or currently being investigated for a release or potential release of a regulated hazardous substance under the CERCLA regulations. A search of the 1995 CERCLIS database revealed one CERC-NFRAP reported site within the subject Property's database search range. This site is located at Liberty Copper And Wire Co. at 2333 Wisconsin Avenue, Downers Grove, Illinois. The CERCLA assessment was completed in March of 1993, and a determination was made of no further action.

Resource Conservation and Recovery Act (RCRA) Facilities:

The RCRA program identifies and tracks hazardous waste from generation source to the point of ultimate disposal. The RCRA facilities database is the composite of reporting facilities that generate, store, transport, treat, or dispose of controlled or hazardous waste. A search of the 1995 RCRA facilities database identified the subject Property as a RCRIS small quantity generator. Housekeeping practices should be improved, however this status is not believed to environmentally impact the Property.

Emergency Response Notification System (ERNS):

The ERNS database is the historical record of all reported releases of oil and other hazardous substances. A search of the ERNS database for the period of 1987-1994 revealed no site-specific spills within the database search range of the subject Property.

Review of State Reported Environmental Data:

This review of the existing compilation of the State environmental database attempts to identify environmental problem sites, activities, and occurrences from the records and reports of the applicable State Agencies. A detailed listing is included in the Appendix.

Illinois Leaking Underground Storage Tanks: (LUST) Incident Reports.

LUST Records contain an inventory of reported leaking underground storage tank incidents. This inventory includes confirmed and potential LUST sites reported to the appropriate agency by the facility or tank owner/operator. Review of the 1995 LUST inventory revealed the subject Property as a LUST site located within the search parameters specified for the subject Property.

The Northwest Envirocon Assessor interviewed Mr. Russel Irwin of the IEPA LUST division on July 24, 1996. According to Mr. Irwin, one 1,000-gallon quench oil tank was removed in March, 1993. The tank was located under the floor of the building and groundwater was not encountered during excavation in which 45 yards of soil was removed. The cleanup standards appear to be in compliance with the new T.A.C.O. requirements. Mr. Irwin further stated that the only thing that seems to be holding this operation from closing, is paperwork. The previous tank does not appear to environmentally impact the Property.

Office of the State Marshal Registered Underground Storage Tanks: (UST)

UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the Illinois Office of the State Fire Marshal. UST records for 1995 revealed eight UST sites located within the search parameters specified for the subject Property. The subject Property at one time contained four underground storage tanks.

The Northwest Envirocon Assessor interviewed a representative from the Downers Grove Fire Department regarding the status of the tanks. According to the representative, two tanks were abandoned in place and two tanks were removed and remediated in late 1991 to early 1993. The abandoned tanks included one 1,800-gallon waste oil tank and one 1,000-gallon cooling tank. To the best of his knowledge the tanks were removed and abandoned within the cleanup objectives.

State of Illinois Solid Waste Landfill Facilities/Landfill Sites: (SWF/LS)

SWF/LS type records typically contain an inventory of solid waste disposal facilities or landfills in the state. These sites may be active or inactive facilities or open dumps that failed to meet RCRA Section 2004 criteria for solid waste landfills or disposal sites. SWF/LS records for 1995 identified one SWF/LF facility located within the search parameters specified for the subject Property. Due to the estimated eastern groundwater flow, this site is not believed to environmentally impact the Property at this time.

Approximate Database Search Range:

The above referenced Federal and State databases were reviewed for an appropriate search distance from the subject Property borders approximating the following radius:

Federal Database/Search Range:

National Priorities List (NPL) of Superfund Sites/1.0 mile

Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) Sites/0.5 mile

Resource Conservation and Recovery Act (RCRA):
TSDS Facilities/1.0 mile
Generators/0.25 mile

Emergency Response Notification System (ERNS) Federally Reported Releases/0.25 mile

State Database/Search Range:

Illinois Registered Underground Storage Tanks/0.5 mile
Illinois Leaking Underground Storage Tanks/0.5 mile
Illinois Landfill and Solid Waste Sites/0.5 mile

STATEMENT OF THE ENVIRONMENTAL PROFESSIONALS

Statement of Quality Assurance

I have performed this Assessment in accordance with generally accepted environmental practices and procedures, as of the date of this Report. I have employed the degree of care and skill ordinarily exercised under similar circumstances by reputable environmental technologists practicing in this area. The conclusions contained within this Assessment are based upon site conditions I readily observed or were reasonably ascertainable and present at the time of my Site inspection.

The conclusions and recommendations stated in this Report are based upon personal observations made by myself and other employees of Northwest Envirocon, Inc. and also upon information provided by others. I have no reason to suspect or believe that the information provided is inaccurate.

Signature of Northwest Envirocon Environmental Professional:

Heather A. Molitor

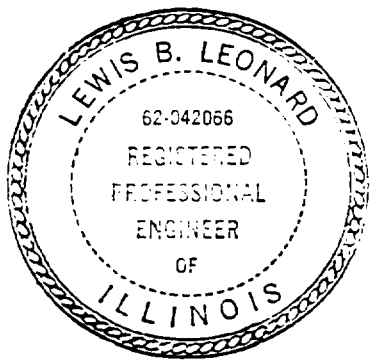
Statement of Quality Control

The objective of this Environmental Site Assessment was to ascertain the potential presence or absence of environmental releases or threatened releases that could impact the subject Property, as delineated by the Scope of Work. The procedure was to perform reasonable steps in accordance with the existing regulations, currently available technology, and generally accepted engineering practices in order to accomplish the stated objective.

The Scope of this Assessment does not purport to encompass every report, record, or other form of documentation relevant to the Property being evaluated. Additionally, this Assessment does not include or address reasonably ascertainable Environmental Liens currently recorded against the Property. To the best of my knowledge, this Environmental Site Assessment has been performed in compliance with Northwest Envirocon, Inc. Standard Operating Procedures protocol for Phase I Environmental Site Assessments.

Signature of Northwest Envirocon Professional Engineer:

Lewis B. Leonard
Professional Engineer
License # 062-042066



Environmental Assessment Report Limitations:

The enclosed Phase I Environmental Site Assessment has been performed for the exclusive use of Mr. James Pielsticker of Arrow Gear Company or agents specified by him for the transaction at issue concerning the Property located at 2301 Curtiss Street and 5240 Belmont Avenue in Downers Grove, Illinois 60515.

This Assessment has been performed in accordance with generally accepted environmental practices and procedures, as of the date of the Report. All services have been performed employing that degree of care and skill ordinarily exercised under similar circumstances by reputable environmental technologists practicing in this, or similar localities. No other warranty or guarantee, expressed or implied, is made or offered.

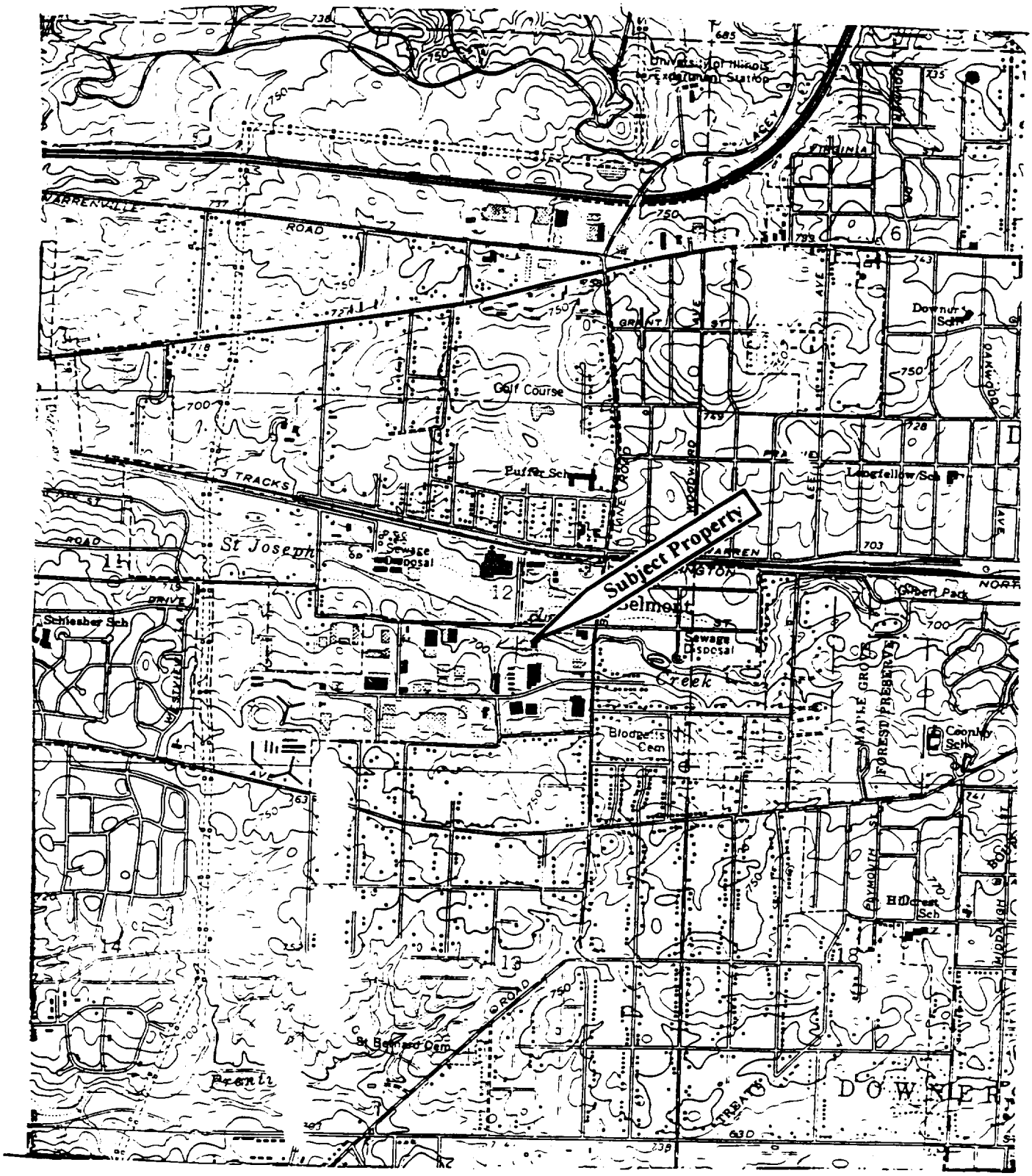
The conclusions and recommendations stated in this Report are based upon observations made by employees of Northwest Envirocon, Inc. and also upon information provided by others. We have no reason to suspect or believe that the information provided is inaccurate. However, we cannot be held responsible for the accuracy of the information provided to us by others. The Scope of this Assessment does not purport to encompass every report, record, or other form of documentation relevant to the Property being evaluated.

This Assessment does not include or address reasonably ascertainable Environmental Liens currently recorded against the subject Property.

The observations contained within this Assessment are based upon site conditions readily visible and present at the time of our Site inspection. These site observations are unable to specifically address conditions of subsurface soil, groundwater, or underground storage tanks, unless specifically mentioned. This Phase I Environmental Site Assessment does not attempt to address the past or forecast the future Site conditions.

SITE LOCATOR MAP

■ SITE PHOTOGRAPHS ■



TOPOGRAPHIC MAP

SITE PHOTOGRAPHS

Photo #1: Front of structure at 2301 Curtiss Street

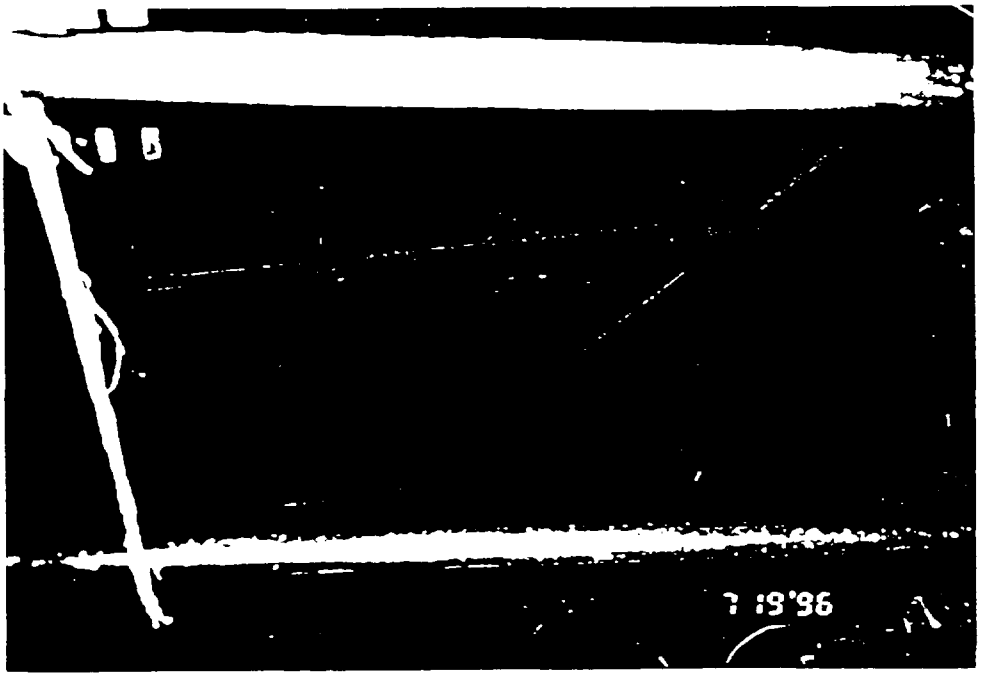


Photo #2: Staining in loading dock.

SITE PHOTOGRAPHS

Photo #3: Drainage in loading dock

Photo #4: Suspected drainage from loading dock

SITE PHOTOGRAPHS

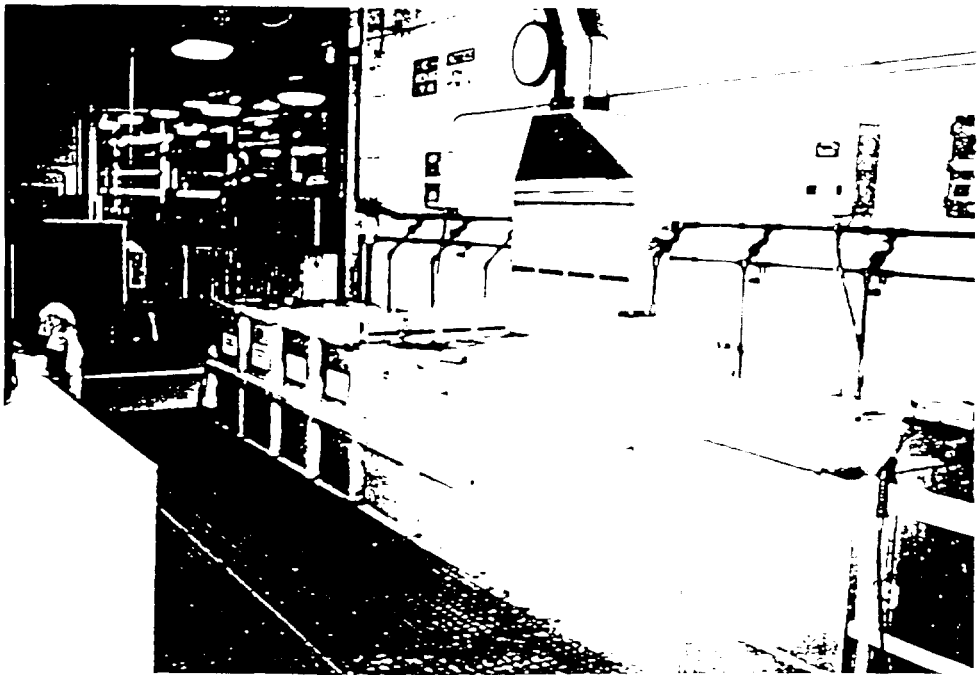


Photo #5: Material storage in 2301 Curtiss Street. Previous location of trichlorethelyne

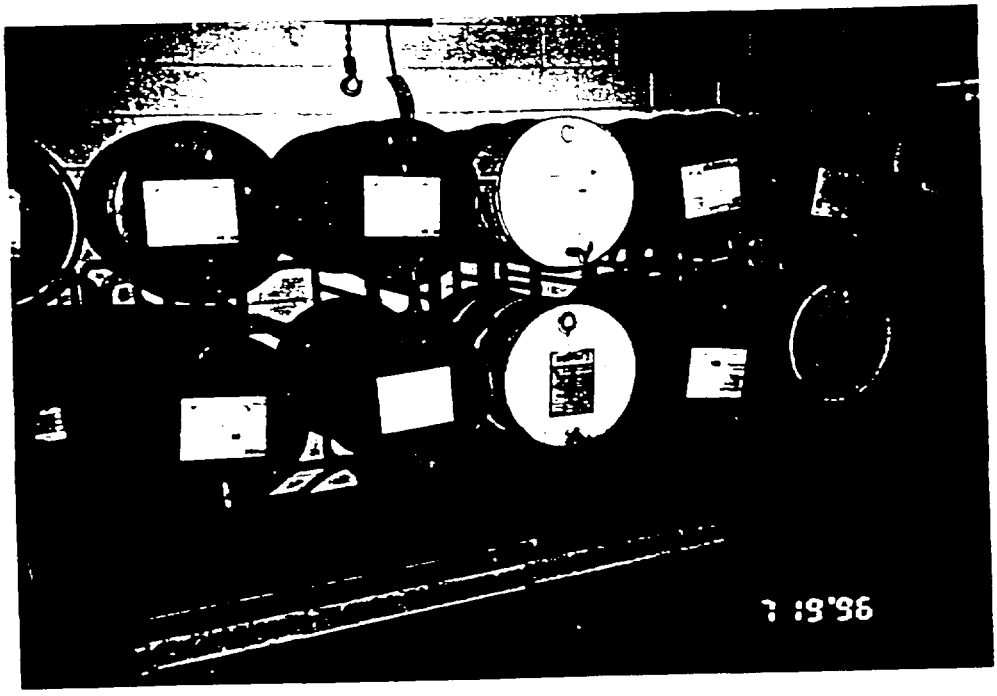


Photo #6: Material storage next to loading dock

SITE PHOTOGRAPHS

Photo #7: Suspect ACM pipe fittings

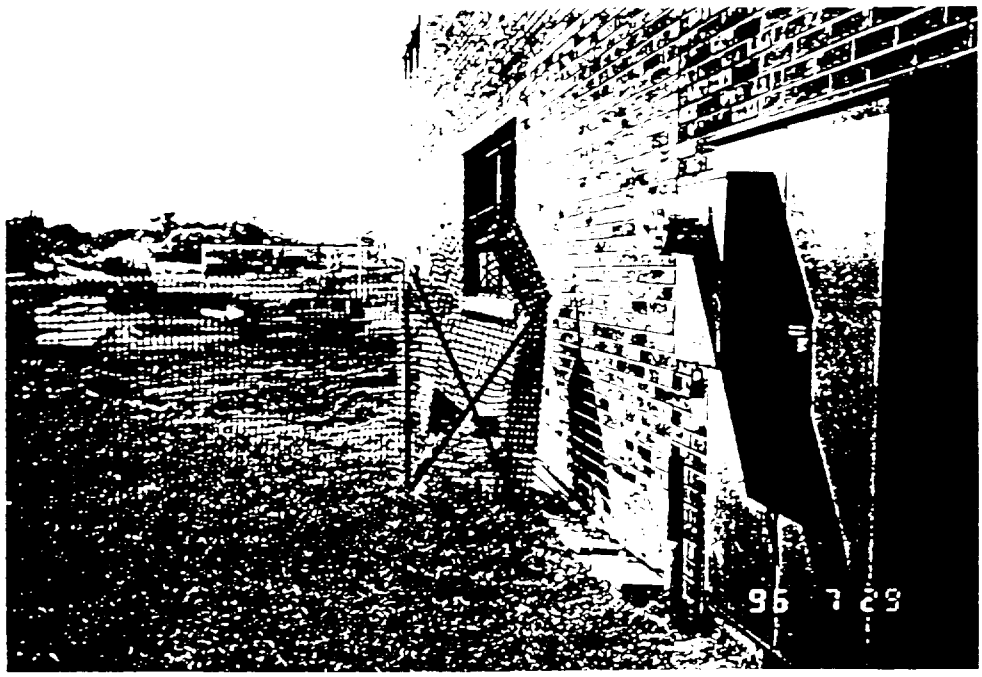


Photo #8: Suspect UST location on southwest corner of building. Note vent and fill pipes

SITE PHOTOGRAPHS

Photo #9: Exterior storage on western side of building.

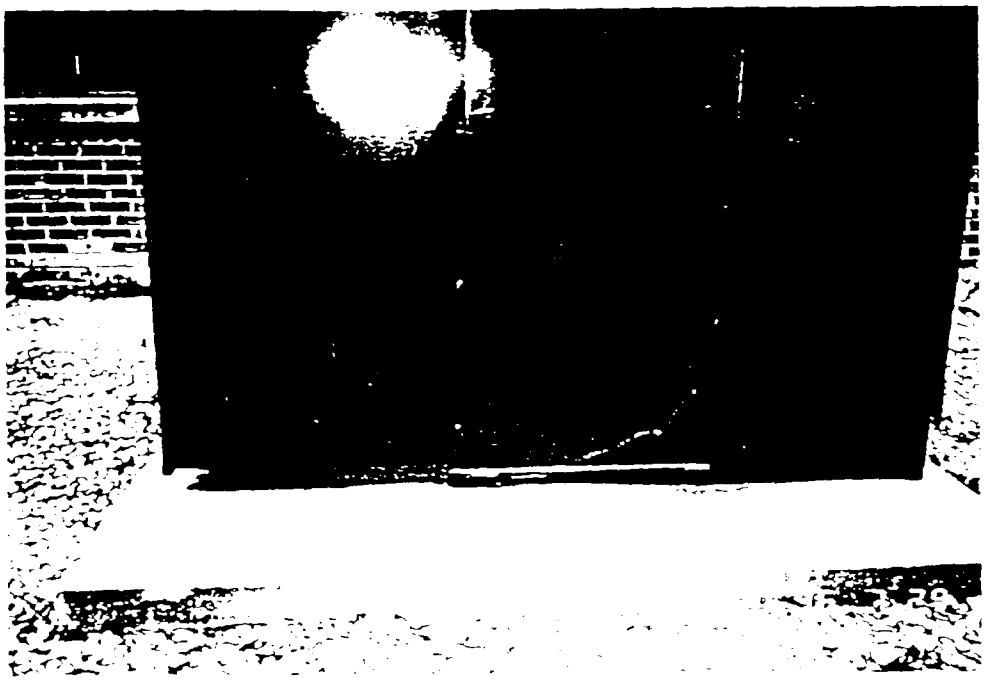


Photo #10: Pad mounted transformer on south side of Property

■ SANBORN MAPS ■

07/17/96

Environmental Data Resources, Inc.
3530 Boston Post Road
Southport, CT 06490

Phone: (203) 255-6606
Fax : (203) 255-1976

Sanborn Map Search

ORDER# 125475-2

Order Date : 07/10/96

Customer Information

H. Molitor
Northwest Envirocon
1000 Jorie Boulevard
Suite 20
Oak Brook, IL 60521
Phone#:708-574-0560
Fax #:708-574-0567

SPECS FOR SANBORN MAP SEARCH:

Site Name & Address:

Arrow Gear Company
2301 Curtiss St.+5240 Belmont

Downers Grove, IL 60515

Account # : 1012525
Account Exec : DSP

Cross Street :
Intersection :
County : du_page

No Sanborn maps were found for the site searched.

■ ENVIRONMENTAL DATABASE ■